

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

SHASE HOWSE,)	CASE NO.: 17-CV-1714
)	
Plaintiff,)	JUDGE:
)	
v.)	DEFENDANT CITY OF
)	CLEVELAND'S NOTICE OF
THOMAS HODOUS, et al.,)	REMOVAL
)	
Defendants.)	

Defendant City of Cleveland hereby give notice that they are removing the entire case of *Howse v. Thomas Hodus, et al.*, Cuyahoga County Common Pleas Court Case No. CV-17883403, to the United States District Court, Northern District of Ohio, Eastern Division. A copy of the relevant Petition and service of process is attached to and incorporated by reference into this Notice as "Exhibit A." This case is removable from state court to federal court on the grounds that Plaintiff's Complaint is pursuant to "the Fourth and Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983."¹

Respectfully Submitted,

BARBARA A. LANGHENRY (0038838)
Director of Law

By: /s/ Stacey Pellom
Stacey M. Pellom (0095292)
Assistant Director of Law
City of Cleveland, Department of Law 601
Lakeside Avenue, Rm. 106
Cleveland, OH 44114-1077
Tel: 216-664-2800

¹ See Exhibit A, Plaintiff's Complaint.

Fax: 216-664-2663

Email: SPellom@city.cleveland.oh.us

Attorney for Defendants

CERTIFICATE OF SERVICE

A copy of the above **Defendant City of Cleveland's Notice of Removal** was served by regular U.S. mail, postage prepaid, upon Michael Nelson, attorney for Plaintiff, at 55 Public Square, Suite 1055, Cleveland, OH 44113 on this 16th day of August, 2017.

s/Stacey M. Pellom

STACEY M. PELLOM